

EXHIBIT 4

To Declaration of L. Moore



Sadeer >

iMessage
Sun, Dec 6, 9:48 PM

Hi Sadeer. Good evening!
Apologies for the late text.
Andrew and I have been at my
youngest child's soccer
tournament all day in Dacula
😂. Not sure if Sarah reached
out to you but was wondering if
you could hop on the phone in
the am with us. There is
something I wanted to bring to
your attention concerning
Olga's email. Notwithstanding
our (you, me, Sarah, and
Andrew) agreement to get
back on the phone for a meet
and confer after we had a
chance to look at each other's
responses to the lists, Olga
indicated in her email that there
would be no meet and confer
about these additional issues



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Sadeer >

about these additional issues but LR 37.1 requires that you certify that a meet and confer on the dispute in question actually happened before you file (it is mandatory) but Olga won't be able to do that since she refused to get on the phone. Again, we remain happy to talk but the failure to do the meet and cure will be fatal to the motion and will likely upset the judge. Again, please don't misunderstand, you all should do what you feel you need to do but as a professional courtesy I want to make sure you were aware of that requirement in LR 37.1. Have a great night. You are welcome to call us tomorrow at your convenience. I hope I did not disturb you. Best regards, Lisa



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